

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090001
Agency Interest No. 39129

Mr. Clint Rutledge
Manager, West Monroe Packaging Plant
Graphic Packaging International Inc.
PO Box 35800
West Monroe, LA 71294-5800

RE: **Part 70 Operating Permit Renewal, Graphic Packaging International Inc - West Monroe Packaging Plant #70, West Monroe, Ouachita Parish, Louisiana**

Dear Mr. Rutledge:

This is to inform you that the permit renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2009.

Permit No.: 2160-00008-V3

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN: rjj
c: EPA Region VI

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
GRAPHIC PACKAGING INTERNATIONAL INC - WEST MONROE PACKAGING PLANT # 70
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL & MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed Part 70 Air Operating Permit Renewal/Modification for Graphic Packaging International, Inc., P.O. Box 35800, West Monroe, LA 71294-5800 for the West Monroe Packaging Plant # 70. **The facility is located at 1070 Jonesboro Rd in West Monroe, Ouachita Parish.**

Graphic Packaging manufactures beverage cartons and carriers from paperboard at the West Monroe Packaging Plant. The manufacturing processes consist of printing, cutting, folding, and gluing.

The company requested the following changes in the permit renewal:

- The decommissioning of four presses and the corona system. The emissions sources to be decommissioned are as follows: Press No. 2 - Exhaust Stack (EPN 5/EQT 002), Press No. 2 - Fugitive Emissions (EPN 48-90/FUG 005), Press No. 3 – Exhaust Stack (EPN 92C/EQT 005), Press No. 3 – Fugitive Emissions (EPN 38-86/FUG 002), Press No. 8 – Exhaust Stack (EPN 97A/EQT 0009), Press No. 8 – Fugitive Emissions (EPN 97B/FUG 0007), Press No. 9 – Exhaust Stack (EPN 98A/EQT 010), Press No. 9 – Fugitive Emissions (EPN 98B/FUG 008), and Corona System (EPN 100/EQT 012) and
- Re-designation of the emission unit descriptions for three of the presses (Press Nos. 10, 11, & 12) to match the nomenclature used on the plant floor (Press Nos. 8, 7, & 9, respectively).

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	20.90	18.24	- 2.66
SO ₂	0.18	0.14	- 0.04
NO _x	26.72	20.26	- 6.46
CO	22.43	16.99	- 5.44
VOC	805.11	618.90	- 186.21
TOTAL TAP	133.46	99.80	- 33.66

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received**

by 12:30 p.m., Wednesday, January 27, 2010. Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permit, and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.

An additional copy may be reviewed at the Ouachita Parish Library - West Monroe Branch, 315 Cypress Street, W Monroe, LA 71291.

Inquiries or requests for additional information regarding this permit action should be directed to Rusty J. Jack, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-0513.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 39129, Permit Number 2160-00008-V3, and Activity Number PER20090001.

Scheduled Publication Date: December 21, 2009

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana**

I. Background

West Monroe Packaging Plant, an existing paperboard box manufacturing facility, began operation in 1958. The West Monroe Packaging Plant currently operates under Permit No. 2160-00008-V2, issued October 21, 2005.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Graphic Packaging International Inc on March 16, 2009 requesting a Part 70 operating permit.

III. Description

Graphic Packaging manufactures beverage cartons and carriers from paperboard at the West Monroe Packaging Plant. The manufacturing processes consist of printing, cutting, folding, and gluing. The printing presses are packaging rotogravure and packaging flexographic presses. Except for the inks for the ink jet printer, which can be either water or solvent based, the inks and overprint varnishes used at this facility are exclusively water based. The product shapes are cut by in-line cutters that limit the production rates to those presented in the emission calculations. The facility is classified as SIC Code 2657, folding paperboard boxes.

The West Monroe Packaging Plant is a major source of VOC as defined in LA 33:III.504 because it emits more than 100 tons per year of VOC. The packaging facility also emits hazardous air pollutants (HAPs) in quantities that exceed 10 tons of any HAP and 25 tons of HAP in aggregate. Therefore, this facility is major source of VOC and HAP.

In addition, the West Monroe Packaging Plant is contiguous to and is under common ownership with the Graphic Packaging International, Inc. Paperboard Mill, Agency Interest No. 1432, which operates under Title V Permit No. 2160-00001-V5, issued March 30, 2009. The Paperboard Mill is a major source of VOC and hazardous air pollutants.

Rotogravure printing presses use steel cylinders that are plated with copper and chrome. The metal cylinders are engraved in such a fashion as to produce image areas on the metal surface that make contact with and impart a design onto the substrate. Water based inks and varnishes are placed into sumps adjacent to the printing stations from where they are continuously circulated to ink fountains. The gravure cylinder rotates in the fountain, and

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

picks up ink in the image area. Excess ink is removed from the non-image area as the cylinder rotates against a steel "doctor blade". The image is transferred to the paperboard when an impression roller pushes the web against it. The printed web then passes through a gas fired drier where heated air (150°F to 200°F) impinges on it. It then moves to the next printing station. Presses 4, 5, 6, 7 (formerly Press No. 11), and 9 (formerly Press No. 12) are rotogravure presses.

Overprint varnish is applied to the printed cartons after all colors are printed. Overprint varnishes are applied with flexographic printing stations. These varnishes are purchased as press-ready, and additives are not added prior to use. Information is printed onto the back and side of some cartons. Back and side printing uses little ink in comparison to the front side designs, and is accomplished with a flexographic printing station. The drying process for inks and coatings occurs when water, VOC and ammonia are volatilized and the ink becomes a film on the substrate surface.

In flexographic printing, the image is printed from a raised area on the surface of a flexible plate wrapped around a steel cylinder. All inks and overprint varnishes are water based. Inks and varnishes circulate from a sump to a fountain at each printing station, and ink is transferred from the fountain to the plate by rollers. The printed web passes through a gas fired drier where hot air impinges and dries the ink into a film through evaporation and absorption. Printing press 8 (formerly Press No. 10) is a flexographic press.

AP-42 specifies retention factors of 2% to 7% for VOC in rotogravure and flexographic inks and varnishes (retention being defined as that VOC that remains with the substrate or is destroyed in the dryer). However, because the retention factor is minor and does not affect Graphic Packaging's status as a Title V facility, Graphic Packaging elected to not use it in calculating potential emissions from the facility. Therefore, for each line, VOC emissions from of the inks and varnishes have been calculated as 100% of the volatile organic component of the water-based ink and varnish products.

Date and code markings are applied to printed cartons and packing cases with ink jet printers. Ink jet printers utilize non-impact dot matrix nozzles to apply ink. The inks can be either water based or solvent based, depending on the drying speed that must be achieved.

After the web is printed, it passes through an inline cutter that cuts the substrate into the proper shape for the carton and removes any excess material. The resulting scrap is continuously collected and sent to a baler. Scrap from the rotogravure presses is transported to balers by a cyclone system. Scrap from the flexographic presses is transported by a

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana**

separator system to the balers. The baled scrap is returned to the paperboard manufacturer for recycling.

The finishing department folds, glues, and packs the cartons for shipment to customers. Water-based adhesives are applied by either straight line or right angle machines, depending on product requirements. As described above, product is marked with dates and other inventory identification information using ink jet printers.

Ink and adhesive are removed from process equipment by utilizing the following equipment: Magnus Tank, Graymills 1 and 2, Anilox Roll Cleaner, Pressure Washers, and PRI Washer. Cleaning operations utilize a soap that does not contain or emit any regulated air pollutants. Therefore, these equipment items are not permitted as emission points. Wastewater from cleaning operations is treated in the plant's wastewater treatment system.

For both rotogravure and flexographic printing presses, Graphic Packaging uses only water-based inks and varnishes that comply with LAC 33:III.2143.A.1. Under this regulation, the volatile fraction, as applied to the substrate, less water and exempt solvent, must contain 25 volume percent or less of organic solvent and 75 volume percent or more of water. Graphic Packaging's rotogravure and flexographic printing inks also comply with the alternate LAC 33:III.2143.A.1 requirement by containing no more than 0.5 pounds of VOC per pound of solids.

The rotogravure inks are purchased as a concentrate and are prepared for printing by mixing with extenders, additives, and a water-n-propanol mixture, that is used primarily as a surface tension modifier. The mixture is 24% by volume (20% by weight) n-propanol and 76% by volume (80% by weight) water. After all components are added, the ink is "press-ready". Occasionally, additives must be replaced due to evaporation while on press. When this is necessary, additives are added into the ink sumps. Flexographic inks are adjusted with additives prior to printing, but are not thinned with water or alcohol.

The press ready rotogravure and flexographic inks contain and emit VOCs, ammonia, a Class III Louisiana toxic air pollutant, and minor quantities of HAPs consisting of glycol ethers, styrene, and acrylic acid. Overprint varnishes are purchased in "press-ready" form, and are not mixed with additives. Overprint varnishes contain and emit VOCs, ammonia, and minor quantities of styrene and acrylic acid.

A capture system is used to minimize fugitive emissions around the press. Graphic Packaging assumes that 65% of the volatile components of the printing press inks and varnishes are captured and discharged through the dryer exhaust stack, along with the dryer

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

combustion products. The remaining volatile components are accounted for as fugitive emissions.

All production adhesives are water based and are used exclusively in finishing operations. Hot melt glues are used for special purposes such as attaching inserts or making repairs. The water based adhesives contain less than 1% VOC by weight. The VOC component is primarily vinyl acetate, which is a Table 51.1 Class III toxic air pollutant.

In addition to the renewal, Graphic Packaging is proposing the following changes:

- The decommissioning of four presses and the corona system. The emissions sources to be decommissioned are as follows: Press No. 2 - Exhaust Stack (EPN 5/EQT 02), Press No. 2 - Fugitive Emissions (EPN 48-90/FUG 05), Press No. 3 – Exhaust Stack (EPN 92C/EQT 05), Press No. 3 – Fugitive Emissions (EPN 38-86/FUG 02), Press No. 8 – Exhaust Stack (EPN 97A/EQT 09), Press No. 8 – Fugitive Emissions (EPN 97B/FUG 07), Press No. 9 – Exhaust Stack (EPN 98A/EQT 10), Press No. 9 – Fugitive Emissions (EPN 98B/FUG 08), and Corona System (EPN 100/EQT 12) and
- Re-designation of the emission unit descriptions for three of the presses (Press Nos. 10, 11, & 12) to match the nomenclature used on the plant floor (Press Nos. 8, 7, & 9, respectively).

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	20.90	18.24	- 2.66
SO ₂	0.18	0.14	- 0.04
NO _X	26.72	20.26	- 6.46
CO	22.43	16.99	- 5.44
VOC	805.11	618.90	- 186.21

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

LAC 33:III Chapter 51 Toxic Air Pollutants (TAP):			
Pollutant	Before	After	Change
Acrylic Acid	1.41	1.00	- 0.41
Ammonia	75.26	52.39	- 22.87
n-Butyl alcohol	1.27	0.88	- 0.39
Diethanolamine	0.05	< 0.01	- 0.05
Ethylene glycol	0.06	0.02	- 0.04
Glycol Ethers (Table 51.1)	40.90	31.78	- 9.12
Methanol	4.19	4.19	0.00
Styrene	3.01	2.23	- 0.78
Vinyl acetate	7.31	7.31	0.00
Total	133.46	99.80	-33.66

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, National Emission Standards for Hazardous Air Pollutants (NESHAP), and Prevention of Significant Deterioration (PSD). New Source Performance Standards (NSPS) do not apply.

This facility is a major source of toxic air pollutants (TAP) pursuant to LAC 33:III.Chapter 51 and is subject to state MACT regulations that require exclusive use of water-based inks and varnishes on rotogravure and flexographic presses. This facility is subject to 40 CFR 63, Subpart KK, as they are also a major source of federal hazardous air pollutants (HAP).

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana**

condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VIII. General Condition XVII Activities

No activities reported.

IX. Insignificant Activities

ID No.	Description	Citation
-	n-Propanol-Water Tanks (2) (1-500 gallon and 1-350 gallon)	LAC 33:III.501.B.5.A.3
-	Glue Tanks (4) (2-3,200 gallon and 2-6,000 gallon)	LAC 33:III.501.B.5.A.3
-	Glue Jog Tank Heater (0.23 MMBTU/hr)	LAC 33:III.501.B.5.A.5
-	Extender Tanks (2) (5,100 gallons each)	LAC 33:III.501.B.5.A.3
-	Water-Based Varnish Tanks (3) (2-6,711 gallon and 1-7,000 gallon)	LAC 33:III.501.B.5.A.3
-	Natural Gas-Fired Space and Water Heaters	
(66)	15,000 BTU/hr Space Heaters	LAC 33:III.501.B.5.A.5
	20,000 BTU/hr Space Heaters	
	30,000 BTU/hr Space Heaters	
	440,000 BTU/hr Water Heaters (hot water pressure washers)	
	480,000 BTU/hr Water Heaters (hot water pressure washer)	

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70

Agency Interest No.: 39129

Graphic Packaging International Inc

West Monroe, Ouachita Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter												40 CFR 60 NSPS			40 CFR 61			40 CFR 63 NESHAP				
		KKK	LL	OO	DD	GG	AA	MM	AA	VV	SS	HH	KK	AA	VV	SS	HH	KK	AA	VV	SS	HH		
UNF 01	West Monroe Packaging Plant #70	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
EQT 01	1A/1B - Alt. Trim Cyclones	1		1																				
EQT 04	92B - Press No. 5, Exhaust Stack	1	1	1	3				1	1								3		1		1		
EQT 06	92D - Press No. 4, Exhaust Stack	1	1	1	3				1	1								3		1		1		
EQT 07	92E - Press No. 6, Exhaust Stack	1	1	1	3				1	1								3		1		1		
EQT 08	96 - Finishing Operations									1														
EQT 11	99 A/B/C - Baler/Separator																			1				
EQT 13	101A - Press No. 8, Exhaust Stack (formerly Press No. 10)	1	1	1	3				1	1								3		1		1		
EQT 14	102 - Video Jet									1	1									3				
EQT 15	103A - Press No. 7, Exhaust Stack (formerly Press No. 11)	1	1	1	3				1	1									3		1		1	
EQT 17	104A - Press No. 9, Exhaust Stack (formerly Press No. 12)	1	1	1	3				1	1								3		1		1		

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
 Agency Interest No.: 39129
 Graphic Packaging International Inc
 West Monroe, Ouachita Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter										40 CFR 60 NSPS	40 CFR 61	40 CFR 63 NESHAP	40 CFR					
		5*	509	9	11	13	15	2103	2111	2113	2115					62	64	66	68	
FUG 01	34-86 - Press No. 5, Fugitive Emissions							1	1						3		1			
FUG 03	37-86 - Press No. 4, Fugitive Emissions								1	1					3		1			
FUG 04	41-88 - Press No. 6, Fugitive Emissions								1	1					3		1			
FUG 09	101B - Press No. 8, Fugitive Emissions (formerly Press No. 10)									1	1				3		1			
FUG 10	103B - Press No. 7, Fugitive Emissions (formerly Press No. 11)									1	1				3		1			
FUG 12	104B - Press No. 9, Fugitive Emissions (formerly Press No. 12)									1	1				3		1			

* The regulations indicated above are State Only regulations.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

West Monroe Packaging Plant #70
Agency Interest No.: 39129
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF 01 West Monroe Plant # 70	Chemical Accident Prevention [40 CFR 68]	DOES NOT APPLY. There are no regulated substances in quantities greater than the threshold quantities specified in 40 CFR 68.130. [40 CFR 68.10(a)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64]	DOES NOT APPLY. No emission points at the plant meet the criteria for CAM applicability (i.e., subject to emission limitation, use of control device to achieve compliance, and has the potential pre-control device emissions greater than the major source threshold). [40 CFR 64.2(a)]
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	DOES NOT APPLY. The facility does not produce, handle, or store substances listed in CFR 68.130 or Table 59.0 and/or Table 59.1 of LAC 33:III.Chapter 59. [LAC 33:III.5907.A]
EQT 04, EQT 06, EQT 07, EQT 13,EQT 15, EQT 17	Emission Standards for Sulfur Dioxide [LAC 33:III.Chapter 15]	DOES NOT APPLY. These sources emit less than 5 tons per year of SO ₂ . [LAC 33:III.1502.A.3]
	NSPS Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing [40 CFR 60.430]	DOES NOT APPLY. Sources do not meet the definition of a publication rotogravure printing press. [40 CFR 60.430(a)]

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Packaging Plant #70
 Agency Interest No.: 39129
 Graphic Packaging International Inc
 West Monroe, Ouachita Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 14	National Emissions Standards for Printing and Publishing Industry [40 CFR 63 Subpart KK]	DOES NOT APPLY. Source does not meet the definition of an affected source under Subpart KK. [40 CFR 63.821(a)]
FUG 01, FUG 03, FUG 04, FUG 09, FUG 10, FUG 12	NSPS Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing [40 CFR 60.430]	DOES NOT APPLY. Sources do not meet the definition of a publication rotogravure printing press. [40 CFR 60.430(a)]

The above table provides explanation for either the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information

AI ID: 39129 Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	2160-00008	CDS Number Graphic Packaging International Inc - West Monroe Packaging Plant TRI #	CDS Number Multimedia Toxic Release Inventory	08-05-2002 08-21-2003 07-19-2004
Physical Location:	71291MNV701000J	1070 Jonesboro Rd West Monroe, LA 71292		Main Phone: 3183969268
Mailing Address:	PO Box 35800 West Monroe, LA 71294-5800			
Location of Front Gate:	32.49 latitude, -92.158 longitude, Coordinate Method: Lat/Long. - DMS, Coordinate Datum: NAD83			
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	John May	PO Box 35800 West Monroe, LA 71294	3183622367 (NP)	Emission Inventory Contact for
	John May	PO Box 35800 West Monroe, LA 71294	MayJS@graphicpkg.	Emission Inventory Contact for
	Clint Rutledge	PO Box 35800 West Monroe, LA 712945800	3183622730 (NP)	Responsible Official for
	Clint Rutledge	PO Box 35800 West Monroe, LA 712945800	RutledgeC@graphic	Responsible Official for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Graphic Packaging International Inc	PO Box 35800 Station 12 West Monroe, LA 712945800	3183622000 (NP)	Operates
	Graphic Packaging International Inc	PO Box 35800 - Station 70 West Monroe, LA 712945800	3188963360 (NP)	Emission Inventory Billing Party
	Graphic Packaging International Inc	PO Box 35800 - Station 70 West Monroe, LA 712945800	3188963360 (NP)	Air Billing Party for
	Graphic Packaging International Inc	PO Box 35800 Station 12 West Monroe, LA 712945800	3183622000 (NP)	Owns
NAIC Codes:	32221, Paperboard Container Manufacturing			

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Millam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70
 Activity Number: PER20090001
 Permit Number: 2160-00008-V2
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
West Monroe Packaging Plant # 70						
EQT 0001	1A1B - Alt. Trim Cyclones		8.1 MM BTU/hr	8.1 MM BTU/hr	Natural gas fired	8760 hr/yr
EQT 0004	92B - Press No. 5, Exhaust Stack		6.5 MM BTU/hr	6.5 MM BTU/hr	Natural gas fired	8760 hr/yr
EQT 0006	92D - Press No. 4, Exhaust Stack		6.2 MM BTU/hr	6.2 MM BTU/hr	Natural gas fired	8760 hr/yr
EQT 0007	92E - Press No. 6, Exhaust Stack					8760 hr/yr
EQT 0008	96 - Finishing Operations					8760 hr/yr
EQT 0011	99A/B/C - Baler/Separator		2.082 MM ft^3/hr		air conveyed cardboard scrap	8760 hr/yr
EQT 0013	101A - Press No. 8, Exhaust Stack (formerly Press No. 10)		2.5 MM BTU/hr	2.5 MM BTU/hr	Natural gas fired	8760 hr/yr
EQT 0014	102 - Video Jet					8760 hr/yr
EQT 0015	103A - Press No. 7, Exhaust Stack (formerly Press No. 11)		9.6 MM BTU/hr	9.6 MM BTU/hr	Natural gas fired	8760 hr/yr
EQT 0017	104A - Press No. 9, Exhaust Stack (formerly Press No. 12)		13.3 MM BTU/hr	13.3 MM BTU/hr	natural gas fired	8760 hr/yr
FUG 0001	34-86 - Press No. 5 Fugitives					8760 hr/yr
FUG 0003	37-86 - Press No. 4 Fugitives					8760 hr/yr
FUG 0004	41-88 - Press No. 6 Fugitives					8760 hr/yr
FUG 0009	101B - Press No. 8 Fugitives (formerly Press No. 10)					8760 hr/yr
FUG 0010	103B - Press No. 7 Fugitives (formerly Press No. 11)					8760 hr/yr
FUG 0012	104B - Press No. 9 Fugitives (formerly Press No. 12)					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
West Monroe Packaging Plant # 70							
EQT 0001	1A1B - Alt. Trim Cyclones	15.3	26000	6	42	42	77
EQT 0004	92B - Press No. 5, Exhaust Stack	40.7	48000	5	53	53	170
EQT 0006	92D - Press No. 4, Exhaust Stack	41.6	24000	3.5	45	45	170
EQT 0007	92E - Press No. 6, Exhaust Stack	40	23052	3.5	42	42	170
EQT 0011	99A/B/C - Baler/Separator	69.3	34700	3	36	36	77
EQT 0013	101A - Press No. 8, Exhaust Stack (formerly Press No. 10)	56	7624	1.7	30	30	150
EQT 0015	103A - Press No. 7, Exhaust Stack (formerly Press No. 11)	141	15000	3.16	39.5	39.5	200
EQT 0017	104A - Press No. 9, Exhaust Stack (formerly Press No. 12)	8.96	675	4	31.5	31.5	180

Relationships:

Subject Item Groups:	Group Description
GRP 0002	2 - Low VOC Ink Requirements: LAC 33:II/2143.A.1 Alternatives 1 & 2
GRP 0003	3 - Printing Press Emissions & Finishing Operations [Excluding Press No. 7 (EQT 15 and Fug 10) and No. 9 (EQT 17 and FUG 12)]

INVENTORIES

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER2009001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

Subject Item Groups:

ID	Group Type	Group Description
UNF 001	Unit or Facility Wide	Entire Facility - West Monroe Packaging Plant # 70

Group Membership:

ID	Description	Member of Groups
EQT 0004	92B - Press No. 5, Exhaust Stack	GRP0000000002, GRP0000000003
EQT 0006	92D - Press No. 4, Exhaust Stack	GRP0000000002, GRP0000000003
EQT 0007	92E - Press No. 6, Exhaust Stack	GRP0000000002, GRP0000000003
EQT 0008	96 - Finishing Operations	GRP0000000003
EQT 0013	101A - Press No. 8, Exhaust Stack (formerly Press No. 10)	GRP0000000002, GRP0000000003
EQT 0015	103A - Press No. 7, Exhaust Stack (formerly Press No. 11)	GRP0000000002
EQT 0017	104A - Press No. 9, Exhaust Stack (formerly Press No. 12)	GRP0000000002
FUG 0001	34-86 - Press No. 5 Fugitives	GRP0000000002, GRP0000000003
FUG 0003	37-86 - Press No. 4 Fugitives	GRP0000000002, GRP0000000003
FUG 0004	41-88 - Press No. 6 Fugitives	GRP0000000002, GRP0000000003
FUG 0009	101B - Press No. 8 Fugitives (formerly Press No. 10)	GRP0000000002, GRP0000000003
FUG 0010	103B - Press No. 7 Fugitives (formerly Press No. 11)	GRP0000000002, GRP0000000003
FUG 0012	104B - Press No. 9 Fugitives (formerly Press No. 12)	GRP0000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0375	0375 Folding Paper Board Boxes	6	Lines

SIC Codes:

2657	Folding paperboard boxes, including sanitary	AI 39129
2657	Folding paperboard boxes, including sanitary	UNF 001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-000008-V2

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
West Monroe Packaging Plant # 70															
EQT 0001 1A1B							3.00	3.90	13.14						
EQT 0004 92B	0.68	0.89	2.98	0.81	1.05	3.55	0.06	0.08	0.27	0.01	0.01	0.02	13.40	17.42	58.68
EQT 0006 92D	0.55	0.71	2.39	0.65	0.85	2.85	0.05	0.06	0.22	<0.01	0.01	0.02	13.39	17.41	58.65
EQT 0007 92E	0.52	0.68	2.28	0.62	0.81	2.72	0.05	0.06	0.21	<0.01	0.01	0.02	15.32	19.92	67.12
EQT 0008 96													1.67	2.17	7.31
EQT 0011 99A/B/C							0.81	1.06	3.56						
EQT 0013 101A	0.21	0.27	0.92	0.25	0.33	1.10	0.02	0.03	0.08	<0.01	0.01	0.01	6.44	8.37	28.18
EQT 0014 102													2.44	3.17	10.69
EQT 0015 103A	0.81	1.05	3.53	0.96	1.25	4.21	0.07	0.10	0.32	0.01	0.01	0.03	16.84	21.89	73.75
EQT 0017 104A	1.12	1.45	4.89	1.33	1.73	5.83	0.10	0.13	0.44	0.01	0.01	0.04	23.88	31.05	104.6
FUG 0001 34-86													7.19	9.35	31.49
FUG 0003 37-86													7.19	9.35	31.49
FUG 0004 41-88													8.23	10.70	36.06
FUG 0009 101B													3.46	4.50	15.14
FUG 0010 103B													9.04	11.75	39.59
FUG 0012 104B													12.82	16.67	56.15

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70****Activity Number: PER20090001****Permit Number: 2160-00008-V2****Air - Title V Regular Permit Renewal**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0004 92B	Acrylic acid	0.02	0.03	0.10
	Ammonia	1.16	1.51	5.08
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.64	0.83	2.79
	Styrene	0.05	0.06	0.22
	n-butyl alcohol	0.02	0.03	0.09
EQT 0006 92D	Acrylic acid	0.02	0.03	0.10
	Ammonia	1.16	1.51	5.08
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.64	0.83	2.79
	Styrene	0.05	0.06	0.22
	n-butyl alcohol	0.02	0.03	0.09
EQT 0007 92E	Acrylic acid	0.03	0.03	0.11
	Ammonia	1.33	1.73	5.82
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.73	0.95	3.19
	Styrene	0.06	0.07	0.25
	n-butyl alcohol	0.02	0.03	0.10
EQT 0008 96	Vinyl acetate	1.67	2.17	7.31
EQT 0013 101A	Acrylic acid	0.02	0.02	0.07
	Ammonia	0.86	1.12	3.76
	Diethanolamine	0.001	0.001	<0.01
	Ethylene glycol	0.002	0.003	0.01
	Glycol ethers (Table 51.1)	0.31	0.41	1.38
	Styrene	0.03	0.04	0.12
	n-butyl alcohol	0.01	0.02	0.06
EQT 0014 102	Glycol ethers (Table 51.1)	0.39	0.50	1.69
	Methanol	0.96	1.25	4.19
EQT 0015 103A	Acrylic acid	0.03	0.03	0.11
	Ammonia	1.35	1.76	5.92
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.89	1.16	3.89
	Styrene	0.06	0.08	0.27

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0015 103A	n-butyl alcohol	0.02	0.03	0.10
EQT 0017 104A	Acrylic acid	0.04	0.05	0.16
	Ammonia	1.92	2.49	8.39
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	1.26	1.64	5.52
	Styrene	0.09	0.11	0.38
	n-butyl alcohol	0.03	0.04	0.14
FUG 0001 34-86	Acrylic acid	0.01	0.02	0.05
	Ammonia	0.63	0.81	2.74
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.34	0.45	1.50
	Styrene	0.03	0.04	0.12
	n-butyl alcohol	0.01	0.01	0.05
FUG 0003 37-86	Acrylic acid	0.01	0.02	0.05
	Ammonia	0.63	0.81	2.74
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.34	0.45	1.50
	Styrene	0.03	0.04	0.12
	n-butyl alcohol	0.01	0.01	0.05
FUG 0004 41-86	Acrylic acid	0.01	0.02	0.06
	Ammonia	0.72	0.93	3.13
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.39	0.51	1.72
	Styrene	0.03	0.04	0.13
	n-butyl alcohol	0.01	0.02	0.05
FUG 0009 1018	Acrylic acid	0.010	0.010	0.04
	Ammonia	0.460	0.600	2.02
	Diethanolamine	<0.001	0.001	<0.01
	Ethylene glycol	0.001	0.001	<0.01
	Glycol ethers (Table 51.1)	0.170	0.220	0.74
	Styrene	0.010	0.020	0.06
	n-butyl alcohol	0.010	0.010	0.03
FUG 0010 103B	Acrylic acid	0.01	0.02	0.06

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0010 103B	Ammonia	0.73	0.95	3.19
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.48	0.62	2.10
	Styrene	0.03	0.04	0.14
	n-butyl alcohol	0.01	0.02	0.05
FUG 0012 104B	Acrylic acid	0.02	0.03	0.09
	Ammonia	1.03	1.34	4.52
	Ethylene glycol	<0.001	<0.001	<0.01
	Glycol ethers (Table 51.1)	0.68	0.88	2.97
	Styrene	0.05	0.06	0.20
UNF 0001 Entire Facility	n-butyl alcohol	0.02	0.02	0.07
	Acrylic acid			1.00
	Ammonia			52.39
	Diethanolamine			<0.01
	Ethylene glycol			0.02
	Glycol ethers (Table 51.1)			31.78
	Methanol			4.19
	Styrene			2.23
	Vinyl acetate			7.31
	n-butyl alcohol			0.88

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS**AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70****Activity Number: PER20090001****Permit Number: 2160-00008-V2****Air - Title V Regular Permit Renewal****EQT 0001 1A/1B - Alt. Trim Cyclones**

- 1 [LAC 33.III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
Cyclone vents: Visible emissions recordkeeping by electronic or hard copy weekly. In the event visible emissions are detected, visible emissions recordkeeping shall thereafter be conducted daily.
- 2 [LAC 33.III.501.C.6] Cyclone vents: Equipment/operational data monitored by technically sound method once every six months or whenever visual checks indicate maintenance may be necessary. Perform maintenance as necessary.
- 3 [LAC 33.III.501.C.6] Which Months: All Year Statistical Basis: None specified
Cyclone vents: Visible emissions monitored by visual inspection/determination weekly. In the event visible emissions are detected, visual inspection shall thereafter be conducted daily.
- 4 [LAC 33.III.501.C.6] Which Months: All Year Statistical Basis: None specified

EQT 0004 92B - Press No. 5, Exhaust Stack

- 5 [LAC 33.III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
- 6 [LAC 33.III.1313.C] Which Months: All Year Statistical Basis: None specified

EQT 0006 92D - Press No. 4, Exhaust Stack

- 7 [LAC 33.III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
- 8 [LAC 33.III.1313.C] Which Months: All Year Statistical Basis: None specified

EQT 0007 92E - Press No. 6, Exhaust Stack

- 9 [LAC 33.III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
- 10 [LAC 33.III.1313.C] Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS**AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70****Activity Number: PER20090001****Permit Number: 2160-00008-V2****Air - Title V Regular Permit Renewal****EQT 0011 99A/B/C - Baler/Separator**

11 [LAC 33:III.1305]

12 [LAC 33:III.1311.C]

Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: Six-minute average

EQT 0013 101A - Press No. 8, Exhaust Stack (formerly Press No. 10)

13 [LAC 33:III.1101.B]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: None specified

14 [LAC 33:III.1313.C]

Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: None specified

EQT 0014 102 - Video Jet

15 [LAC 33:III.5107.A.2]

Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

MACT is determined to be existing operations.

EQT 0015 103A - Press No. 7, Exhaust Stack (formerly Press No. 11)

17 [40 CFR 63.825(b)(3)i]

40 CFR Part 63 Subpart KK Requirement: Permitee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as purchased basis, as determined in accordance with 63.827(b)(2). Permitee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)i]

40 CFR Part 63 Subpart KK Alternative Requirement: Permitee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.20 kg of organic HAP per kg of solids applied on a monthly average, as-applied basis. HAP content determined in accordance with 63.827(b)(2). As-applied solids content determined in accordance with 63.827(c)(2). Permitee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)i]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

EQT 0015 103A - Press No. 7, Exhaust Stack (formerly Press No. 11)

20 [LAC 33:III.1313.C]

21 [LAC 33:III.509]

22 [LAC 33:III.509]

23 [LAC 33:III.5109.A]

Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: None specified
 BACT for Ink Use: Use of inks with a volatile organic content of no more than 0.50 pounds of volatile organic compounds per pound of solids shall constitute BACT for VOC emission control. Cross line averaging may be employed per LAC 33:III.2143.A.5. Maintain records at the facility to verify compliance in accordance with LAC 33:III.2143.D. [From PSD-LA-697 (M-1)].
 BACT for Dryer Burner: Good combustion practices, consisting of sound design, use of inherently low-polluting natural gas, and proper operating and maintenance procedures to control VOC emissions, shall be BACT for the dryer burner. [From PSD-LA-697 (M-1)].
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR Part 63 Subpart KK constitutes MACT.

EQT 0017 104A - Press No. 9, Exhaust Stack (formerly Press No. 12)

24 [40 CFR 63.825(b)(3)j]

25 [40 CFR 63.825(b)(3)j]

26 [LAC 33:III.1101.B]

27 [LAC 33:III.1313.C]

28 [LAC 33:III.509]

29 [LAC 33:III.509]

30 [LAC 33:III.5109.A]

40 CFR Part 63 Subpart KK Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as purchased basis, as determined in accordance with 63.827(b)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)j]
 40 CFR Part 63 Subpart KK Alternative Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.20 kg of organic HAP per kg of solids applied on a monthly average, as-applied basis. HAP content determined in accordance with 63.827(b)(2). As-applied solids content determined in accordance with 63.827(c)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)j]
 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 BACT for Ink Use: Use of inks with a volatile organic content of no more than 0.50 pounds of volatile organic compounds per pound of solids shall constitute BACT for VOC emission control. Cross line averaging may be employed per LAC 33:III.2143.A.5. Maintain records at the facility to verify compliance in accordance with LAC 33:III.2143.D. [From PSD-LA-697 (M-1)].
 BACT for Dryer Burner: Good combustion practices, consisting of sound design, use of inherently low-polluting natural gas, and proper operating and maintenance procedures to control VOC emissions, shall be BACT for the dryer burner. [From PSD-LA-697 (M-1)].
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR 63 Subpart KK constitutes MACT.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR Part 63 Subpart KK constitutes MACT.

SPECIFIC REQUIREMENTS**AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70****Activity Number: PER2009001****Permit Number: 2160-00008-V2****Air - Title V Regular Permit Renewal****FUG 0010 103B - Press No. 7 Fugitives (formerly Press No. 11)**

- 32 [40 CFR 63.825(b)(1)] 40 CFR Part 63 Subpart KK Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as purchased basis, as determined in accordance with 63.827(b)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(1)]
- 33 [40 CFR 63.825(b)(3)(i)] 40 CFR Part 63 Subpart KK Alternative Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.20 kg of organic HAP per per kg of solids applied on a monthly average, as-applied basis. HAP content determined in accordance with 63.827(b)(2). As-applied solids content determined in accordance with 63.827(c)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)(i)]
- 34 [LAC 33:III.509] BACT for Ink Use: Use of inks with a volatile organic content of no more than 0.50 pounds of volatile organic compounds per pound of solids shall constitute BACT for VOC emission control. Cross line averaging may be employed per LAC 33:III.2143.A.5. Maintain records at the facility to verify compliance in accordance with LAC 33:III.2143.D. [From PSD-LA-697 (M-1)].
- 35 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR Part 63 Subpart KK constitutes MACT.

FUG 0012 104B - Press No. 9 Fugitives (formerly Press No. 12)

- 36 [40 CFR 63.825(b)(3)i] 40 CFR Part 63 Subpart KK Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as purchased basis, as determined in accordance with 63.827(b)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)i]
- 37 [40 CFR 63.825(b)(3)ii] 40 CFR Part 63 Subpart KK Alternative Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.20 kg of organic HAP per per kg of solids applied on a monthly average, as-applied basis. HAP content determined in accordance with 63.827(b)(2). As-applied solids content determined in accordance with 63.827(c)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)ii]
- 38 [LAC 33:III.509] BACT for Ink Use: Use of inks with a volatile organic content of no more than 0.50 pounds of volatile organic compounds per pound of solids shall constitute BACT for VOC emission control. Cross line averaging may be employed per LAC 33:III.2143.A.5. Maintain records at the facility to verify compliance in accordance with LAC 33:III.2143.D. [From PSD-LA-697 (M-1)].
- 39 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR 63 Subpart KK constitutes MACT.
- 40 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR Part 63 Subpart KK constitutes MACT.

GRP 0002 2 - Low VOC Ink Requirements: LAC 33:III.2143.A.1 Alternatives 1 & 2

Group Members: EQT 0004EQT 0006EQT 0007EQT 0013EQT 0015EQT 0017FUG 0001FUG 0003FUG 0004FUG 0009FUG 0010FUG 0012

SPECIFIC REQUIREMENTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

GRP 0002 2 - Low VOC Ink Requirements: LAC 33:III.2143.A.1 Alternatives 1 & 2

- 41 [LAC 33:III.2143.A.1] Alternative 2-Limit on volatile organic content of ink: VOC fraction < 0.5 lb of volatile organic compound per pound of solids.
Which Months: All Year Statistical Basis: Batch cycle average
- 42 [LAC 33:III.2143.A.1] Alternative 1-Limit on as applied ink solvent content (less exempt solvent): Solvent content < 25 % by volume.
Which Months: All Year Statistical Basis: Batch cycle average
- 43 [LAC 33:III.2143.A.1] Alternative 1: Permittee shall use inks in which the solvent fraction of ink, as it is applied to the substrate, less exempt solvent, contains 25% volume percent or less of organic solvent and 75 volume percent or more of water per LAC 33:III.2143.A.1. Exempt solvents are those compounds listed in LAC 33:III.2117. Cross line averaging may be employed per LAC 33:III.2143.A.5.
- 44 [LAC 33:III.2143.A.1] Alternative 2: Permittee shall use inks in which the volatile organic content of ink is no more than 0.5 pounds of volatile organic compound per pound of solids. Cross line averaging may be employed per LAC 33:III.2143.A.5. Note: Permittee must comply with one of the above alternatives.

Alternative 1- Solvent content monitored by technically sound method as needed.

- Which Months: All Year Statistical Basis: Cycle average
Alternative 2- VOC fraction monitored by technically sound method as needed.
- 45 [LAC 33:III.2143.C] Which Months: All Year Statistical Basis: Cycle average
- 46 [LAC 33:III.2143.C] Alternative 1 or 2: Permittee shall maintain records for at least two years to verify compliance with LAC 33:III.2143. The records shall include, but not be limited to, usage reports and material data sheets which document the amounts used, the volatile organic content, composition, solids content, solvent density and other relevant information for each ink and coating used. Solvent content recordkeeping by manual logging as needed.

GRP 0003 3 - Printing Press Emissions & Finishing Operations [Excluding Press No. 7 (EQT 15 and Fug 10) and No. 9 (EQT 17 and FUG 12)]

Group Members: EQT 0004EQT 0006EQT 0007EQT 0008EQT 0013FUG 0001FUG 0003FUG 0004FUG 0009

- 48 [40 CFR 63.825(b)(1)] 40 CFR Part 63 Subpart KK Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as purchased basis, as determined in accordance with 63.827(b)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(1)]
- 49 [40 CFR 63.825(b)(3)(i)] 40 CFR Part 63 Subpart KK Alternative Requirement: Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer and other solid containing material applied during the month contains no more than 0.20 kg of organic HAP per kg of solids applied on a monthly average, as-applied basis. HAP content determined in accordance with 63.827(b)(2). As-applied solids content determined in accordance with 63.827(c)(2). Permittee shall comply with all applicable recordkeeping requirements of 63.829 and reporting requirements of 63.830. [40 CFR 63.825(b)(3)(i)]
- 50 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
- 51 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT). DEQ has determined that compliance with 40 CFR 63 Subpart KK constitutes MACT.

SPECIFIC REQUIREMENTS**AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70****Activity Number:** PER2009001**Permit Number:** 2160-00008-V2**Air - Title V Regular Permit Renewal****UNF 0001 Entire Facility - West Monroe Packaging Plant # 70**

- 52 [40 CFR 60.]
 53 [40 CFR 61.145(b)(1)]
 54 [40 CFR 61.148]
 55 [40 CFR 61.]
 56 [40 CFR 63.]
 57 [40 CFR 82.Subpart F]
 58 [LAC 33:III.1.103]
 59 [LAC 33:III.1.109.B]
 60 [LAC 33:III.1.130.B]
 61 [LAC 33:III.2.113.A]
 62 [LAC 33:III.2.19]
 63 [LAC 33:III.5.09]
 64 [LAC 33:III.5.105.A.1]
 65 [LAC 33:III.5.105.A.2]
 66 [LAC 33:III.5.105.A.3]
 67 [LAC 33:III.5.105.A.4]
 68 [LAC 33:III.5.107.A.2]
 69 [LAC 33:III.5.107.A]
- All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
 Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
 Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M.[40 CFR 61.145(b)(1)]
 Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 1 of 40 CFR 63 Subpart K.K.
 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.1.11 or intensify an existing traffic hazard condition are prohibited.
 Outdoor burning of waste material or other combustible material is prohibited.
 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2.113.A.1-5.
 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
 Comply with the requirements of PSD-LA-697 (M-1). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-697 (M-1).
 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III Chapter 51.Subchapter A, after the effective date of the standard.
 Do not cause a violation of any ambient air standard listed in LAC 33:III.5.112.Table 51.2, unless operating in accordance with LAC 33:III.5.109.B.
 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
 Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
 Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

SPECIFIC REQUIREMENTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

UNF_0001 Entire Facility - West Monroe Packaging Plant # 70

70 [LAC 33:III.5107.B.1]

Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

71 [LAC 33:III.5107.B.2]

Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.

72 [LAC 33:III.5107.B.3]

Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931.

73 [LAC 33:III.5107.B.4]

Submit notification: Due to certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii. Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.

74 [LAC 33:III.5107.B.5]

Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.

An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.

75 [LAC 33:III.5109.C]

Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]

76 [LAC 33:III.5151.F.1.]

Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.

SPECIFIC REQUIREMENTS

AI ID: 39129 - Graphic Packaging International Inc - West Monroe Packaging Plant #70

Activity Number: PER20090001

Permit Number: 2160-00008-V2

Air - Title V Regular Permit Renewal

UNF_0001 Entire Facility - West Monroe Packaging Plant # 70

80 [LAC 33:II.9(9.D)]

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:II.9(A-D).